

Robert B. Gerard, Esq. (Nevada State Bar #005323)  
 Ricardo R. Ehmann, Esq. (Nevada State Bar #010576)  
**GERARD & ASSOCIATES**  
 2840 South Jones Boulevard  
 Building D, Suite #4  
 Las Vegas, Nevada 89146  
 Telephone: (702) 251-0093  
 Facsimile: (702) 251-0094

Norman Blumenthal, Esq. (California State Bar #068687)  
**BLUMENTHAL, NORDREHAUG & BHOWMIK**  
 2255 Calle Clara  
 La Jolla, California 92037  
 Telephone: (858) 551-1223  
 Facsimile: (858) 551-1232

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARY ANN SUSSEX, et al.	)	CASE NO.: <b>2:08-cv-00773-MMD-PAL</b>
	)	(Consolidated with Case No.
Plaintiffs,	)	2:11-cv-01007-MMD-PAL)
vs.	)	
	)	<b>NOTICE OF MOTION AND MOTION</b>
TURNBERRY/MGM GRAND TOWERS,	)	<b>FOR CERTIFICATION OF ORDER</b>
LLC, et al.	)	<b>GRANTING DEFENDANTS' MOTION</b>
	)	<b>TO DISQUALIFY PURSUANT TO 28</b>
Defendants.	)	<b>U.S.C. § 1292(b)</b>

<u>(Consolidated With)</u>	)	Hearing Date: TBD
	)	Hearing Time: TBD

GEORGE ABRAHAM, et al.,	)	
Plaintiffs,	)	Before: Hon. Miranda Du
v.	)	Department: 4A
TURNBERRY/MGM GRAND TOWERS,	)	
LLC, a Nevada LLC, et al.	)	
Defendants.	)	

NOTICE OF MOTION AND MOTION FOR CERTIFICATION OF ORDER GRANTING DEFENDANTS' MOTION TO  
 DISQUALIFY PURSUANT TO 28 U.S.C. § 1292(b)

Case No. 2:08-cv-00773

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Please take notice that, before the Honorable Miranda M. Du, Judge for the United States District Court for the District of Nevada on a date and time to be set by the Court, Plaintiffs will and hereby do move for certification of the Order Granting Defendants' Motion to Disqualify pursuant to 28 U.S.C. § 1292(b). This motion is based upon this notice, the accompanying Memorandum of Points and Authorities, along with the pleadings and documents contained in the Court's record.

Respectfully submitted,

Dated: January 8, 2014

BLUMENTHAL, NORDREHAUG & BHOWMIK

By: /s/ Norman B. Blumenthal  
Norman B. Blumenthal

2255 Calle Clara  
La Jolla, California 92037  
Telephone: (858) 551-1223  
Facsimile: (858) 551-1232

Gerard & Associates  
2840 South Jones Blvd.  
Building D, Unit 4  
Las Vegas, Nevada 89146  
Telephone: (702) 251-0093  
Facsimile: (702) 251-0094

Burt Wiand  
Florida State Bar #407690  
Wiand Guerra King  
3000 Bay Port Drive, Suite 600  
Tampa, FL 33607  
Telephone: (813) 347-5100  
Facsimile: (813) 347-5199

***Attorneys For The Plaintiffs***

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of GERARD & ASSOCIATES, and that the following documents were served via electronic service on January 8, 2014: **NOTICE OF MOTION AND MOTION FOR CERTIFICATION OF ORDER GRANTING DEFENDANTS' MOTION TO DISQUALIFY PURSUANT TO 28 U.S.C. § 1292(b) TO:**

Attorneys for Defendants

Steve Morris, Esq.  
MORRIS LAW GROUP  
900 Bank of America Plaza  
300 South Fourth Street  
Las Vegas, NV 89101

Alex Fugazzi, Esq.  
SNELL & WILMER  
3883 Howard Hughes Parkway  
Suite 1100  
Las Vegas, NV 89169

/s/ Ricardo Ehmman  
An Employee of Gerard & Associate